

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Melvin Geiger
Debtor

Chapter 13
Bankruptcy No. 23-10608-amc

Lakeview Loan Servicing, LLC, or its Successor or
Assignee

Movant

vs.

Kenneth E. West, Trustee
Melvin Geiger

Respondents

CERTIFICATION OF DEFAULT

I, Andrew M. Lubin, attorney for Lakeview Loan Servicing, LLC, or its Successor or Assignee, in accordance with Settlement Stipulation approved by the Court August 8, 2023 and attached hereto as Exhibit "A", hereby certify the following:

1. That Debtor, Melvin Geiger has failed to maintain payments as described in said Settlement Stipulation.
2. That a Notice of Default was served upon Debtor and Debtor's counsel by United States Mail, first class, postage prepaid, on February 21, 2024; a true and correct copy of such Notice is attached hereto, made a part hereof, and marked as Exhibit "B"
3. That ten (10) days have elapsed, and Debtor has failed to cure the delinquency.
4. That upon filing this Certification, in accordance with the Settlement Stipulation, an Order shall be entered granting Lakeview Loan Servicing, LLC, or its Successor or Assignee relief from the automatic stay to foreclose its mortgage and, without limitation, to exercise any other rights it has under the mortgage or with respect to Debtor(s)' property located at 1113 Edmonds Avenue, Drexel Hill, Pennsylvania 19026.

/s/ Andrew M. Lubin, Esquire
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